

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
GREENVILLE DIVISION

In re:)
)
CAH ACQUISITION COMPANY #1, LLC,) Case No. 19-00730-5-JNC
d/b/a WASHINGTON COUNTY HOSPITAL)
) Chapter 11
Debtor.)
)

**SECOND INTERIM FEE APPLICATION OF GREENBERG TRAURIG, LLP FOR
ALLOWANCE OF INTERIM COMPENSATION AND REIMBURSEMENT OF
EXPENSES AS COUNSEL FOR THE PATIENT CARE OMBUDSMAN FOR THE TIME
PERIOD OF AUGUST 1, 2019 THROUGH JANUARY 31, 2020**

Greenberg Traurig, LLP (“**Greenberg Traurig**”), counsel to Suzanne Koenig, Patient Care Ombudsman (the “**Ombudsman**”), hereby submits its second interim fee application (the “**Application**”) and seeks entry of an order pursuant to 11 U.S.C. §§ 330 and 331, granting approval of its interim compensation and reimbursement of expenses for the period from August 1, 2019 through January 31, 2020 (the “**Second Interim Period**”). In support thereof, Greenberg Traurig respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
2. The statutory predicates for relief sought herein are sections 105, 330 and 333 of the Bankruptcy Code and Bankruptcy Rules 2014 and 2016.

BACKGROUND

3. On February 19, 2019, CAH Acquisition Company #1, LLC (“CAH #1”) filed a petition for relief under Chapter 11 of the United States Bankruptcy Code. Thomas W. Waldrep, Jr. was appointed as Chapter 11 Trustee on March 18, 2019.

4. On March 28, 2019 and subsequently on April 9, 2019, the Bankruptcy Administrator filed a report and recommendation regarding the appointment of a patient care ombudsman [Docket No.’s 66 and 113].

5. On April 17, 2019, the Court entered an order regarding the appointment of a patient care ombudsman under section 333 of the Bankruptcy Code and appointed Suzanne Koenig of SAK Management Services, LLC (“SAK”) as the Ombudsman [Docket No. 158] for CAH #1.

6. On July 12, 2019, the Ombudsman filed the *Application of the Patient Care Ombudsman for Entry of an Order Authorizing the Retention and Employment of Greenberg Traurig, LLP as Counsel, Nunc Pro Tunc as of July 1, 2019* [Docket No. 325].

7. On August 8, 2019, this Court entered the *Order Authorizing the Retention and Employment of Greenberg Traurig, LLP, as Counsel, Nunc Pro Tunc as of July 1, 2019* [Docket No. 373].

8. On October 25, 2019, this Court entered the *Order Granting First Interim Fee Application of Greenberg Traurig, LLP for Allowance of Interim Compensation and Reimbursement of Expenses as Counsel for the Patient Care Ombudsman for the Time Period of July 1, 2019 Through July 31, 2019* [Docket No. 507] (the “**First Interim Fee Order**”). Based on the First Interim Fee Order, this Court approved \$655.00 in fees and \$0 in expenses incurred. As of the date of this Application, Greenberg Traurig has not been paid any amounts approved by this First Interim Fee Order.

SUMMARY OF FEES INCURRED/SERVICES RENDERED

9. During the Second Interim Period, Greenberg Traurig timekeepers billed a total of 7.10 hours, with the fees totaling \$3,736.00¹. Greenberg Traurig believes that these fees are reasonable and fair in light of the complexity of this Case. A summary of fees incurred during the Second Interim Application are organized by (a) timekeeper and (b) by task/project category and are listed below. Attached hereto as **Exhibit A** are invoices detailing the services rendered during the Second Interim Period (the “**Monthly Invoices**”).

COMPENSATION BY INDIVIDUAL

Name of Professional Person	Position of Professional Person	Hourly Billing Rate	Total Hours Billed	Total Compensation	Hourly Rate Allowed by Court in Most Recent Fee Award Order
Nancy A. Peterman	Shareholder	\$650	3.50	\$2,275.00	\$650
Nancy E. Taylor	Shareholder	\$975	0.50	\$487.50	N/A
Danny Duerdoh	Associate	\$435	0.10	\$43.50	N/A
Tess. D. Meyer	Associate	\$550	1.20	\$660.00	N/A
Carla Greenberg	Paralegal	\$150	1.80	\$270.00	\$150
Grand Total:			7.10	\$3,736.00	

COMPENSATION BY PROJECT CATEGORY

Task Code	Project Category	Total Hours	Total Fees
804	Case Administration	0.60	\$390.00
805	Claims Administration and Objections	1.70	\$1,147.50
809	Financing Matters & Cash Collateral	0.30	\$195.00
813	Fee/Employment Applications	2.60	\$790.00
824	Preparation/Review Reports	1.90	\$1,213.50

¹ As a courtesy and for this case only, Nancy Peterman has reduced her billing rate from \$950 per hour to \$650 per hour.

SUMMARY OF EXPENSES

10. During the Second Interim Period, Greenberg Traurig did not incur or disburse any actual and necessary costs and expenses related to this Case. Therefore, Greenberg Traurig is not applying for reimbursement of expenses incurred during the Second Interim Period.

SUMMARY AND CONCLUSION

11. During the Second Interim Period, Greenberg Traurig expended a total of 7.10 hours rendering professional services to the Ombudsman. Based upon the total number of hours spent in connection with Greenberg Traurig's representation of the Ombudsman, the amount of fees incurred during the Second Interim Period is \$3,736.00. Greenberg Traurig requests approval and payment of 100% of these discounted professional fees incurred during the Second Interim Period.

12. As counsel to the Ombudsman, Greenberg Traurig did not incur any out-of-pocket expenses during the Second Interim Period. Therefore, Greenberg Traurig is not requesting reimbursement of expenses during the Second Interim Period.

13. Greenberg Traurig has extensive experience in the areas of restructuring, bankruptcy and healthcare and extensive experience representing the Ombudsman. Attached as **Exhibit B** is the biographical information for each attorney and support staff involved in providing legal services to the Ombudsman in connection with this case. Greenberg Traurig diligently represented the Ombudsman during this Case. Based upon the circumstances, the fair value of the professional services rendered by Greenberg Traurig to the Ombudsman, the skill required, the nature of services rendered and the results obtained, the fees charged by Greenberg Traurig for its services are reasonable.

14. All services for which Greenberg Traurig requests compensation were performed for and on behalf of the Ombudsman, and not on behalf of any other entity.

15. No agreement or understanding exists between Greenberg Traurig or any other person for sharing compensation that has been or will be received, except such sharing as is customary and generally accepted among lawyers within a law firm.

16. No agreement or understanding, express or implied, has been or will be entered into for the purpose of fixing the fees or other compensation to be paid to any other attorney for any party in interest, to any other party in interest, or to any person for services rendered in connection with this Case.

NOTICE

17. Notice of this Application has been provided to all parties who (a) receive notice in this Case via electronic ECF notification, (b) the Bankruptcy Administrator; (c) the Chapter 11 Trustee; (d) counsel for the Debtor; and (e) any party that has requested notice pursuant to Bankruptcy Rule 2002.

WHEREFORE, Greenberg Traurig respectfully requests that this Court enter an Order:

- (i) allowing compensation, on an interim basis, in the amount of \$3,736.00;
- (ii) allowing expenses, on an interim basis, in the amount of \$0;
- (iii) authorizing and directing the Chapter 11 trustee to pay Greenberg Traurig \$3,736.00, representing 100% of compensation and expenses incurred during the Second Interim Period upon consent from First Capital Corporation; and
- (iv) granting such other and further relief deemed appropriate under the circumstances.

Dated: February 26, 2020

By: /s/ Brian R. Anderson

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and

Nancy A. Peterman
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Greenberg Traurig, LLP
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Chicago, IL 60642
(312) 456-8400

*Counsel to the Suzanne Koenig, the
Patient Care Ombudsman*

EXHIBIT A

GREENBERG TRAURIG INVOICES



Invoice No.: 5174236
File No. : 102171.013900
Bill Date : September 20, 2019

Suzanne Koenig, as Patient Care Ombudsman
SAK Management Services, LLC
300 Saunders Rd.
Suite 300
Riverwoods, IL 60015

Attn: Suzanne Koenig

INVOICE

Re: CAH Acquisition Company #1, LLC d/b/a Washington County Hospital

Legal Services through August 31, 2019:

FINANCING MATTERS & CASH COLL:	\$	195.00
FEE/EMPLOYMENT APPLICATIONS:	\$	790.00
PREPARATION/REVIEW REPORTS:	\$	260.00
 Total Fees:	\$	1,245.00
 Current Invoice:	\$	<u>1,245.00</u>

NAP:MK
Tax ID: 13-3613083

Invoice No.: 5174236
Matter No.: 102171.013900

Page 1

Description of Professional Services Rendered:

TASK CODE: 809 FINANCING MATTERS & CASH COLL

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/12/19	Nancy A. Peterman	Draft email to Trustee's counsel re cash collateral issues.	0.10	65.00
08/28/19	Nancy A. Peterman	Telephone conference with Trustee's counsel re cash collateral budget issues.	0.10	65.00
08/28/19	Nancy A. Peterman	Review and analysis of cash collateral stipulation.	0.10	65.00
				<hr/>
Total Hours:				0.30
				Total Amount: \$ 195.00

TIMEKEEPER SUMMARY FOR TASK CODE 809,

FINANCING MATTERS & CASH COLL

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Nancy A. Peterman	0.30	650.00	195.00
Totals:	0.30	650.00	\$ 195.00

Invoice No.: 5174236
Matter No.: 102171.013900

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Description of Professional Services Rendered

TASK CODE: 813 FEE/EMPLOYMENT APPLICATIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/05/19	Nancy A. Peterman	Telephone conference with Lenders' counsel re retention objection.	0.30	195.00
08/05/19	Nancy A. Peterman	Revise GT/SAK retention orders.	0.20	130.00
08/26/19	Carla Greenberg	Draft first interim fee application for GT.	0.90	135.00
08/27/19	Carla Greenberg	Draft first interim fee application for SAK.	0.90	135.00
08/27/19	Nancy A. Peterman	Revise fee applications for GT (.10) and SAK (.20).	0.30	195.00
				<hr/>
			Total Hours:	2.60
			Total Amount:	\$ 790.00

TIMEKEEPER SUMMARY FOR TASK CODE 813,

FEE/EMPLOYMENT APPLICATIONS

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Nancy A. Peterman	0.80	650.00	520.00
Carla Greenberg	1.80	150.00	270.00
Totals:	2.60	303.85	\$ 790.00

Invoice No.: 5174236
Matter No.: 102171.013900

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Description of Professional Services Rendered

TASK CODE: 824 PREPARATION/REVIEW REPORTS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/16/19	Nancy A. Peterman	Review and comment on PCO report.	0.40	260.00
			Total Hours:	0.40
			Total Amount:	\$ 260.00

TIMEKEEPER SUMMARY FOR TASK CODE 824,

PREPARATION/REVIEW REPORTS

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Nancy A. Peterman	0.40	650.00	260.00
Totals:	0.40	650.00	\$ 260.00

Invoice No.: 5174236
Matter No.: 102171.013900

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Description of Professional Services Rendered

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Nancy A. Peterman	1.50	650.00	975.00
Carla Greenberg	1.80	150.00	270.00
Totals:	3.30	377.27	\$ 1,245.00

Invoice No.: 5174236

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Re: CAH Acquisition Company #1, LLC d/b/a Washington County Hospital

Matter No.: 102171.013900

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No. : 5222251
File No. : 102171.013900
Bill Date : November 7, 2019

Suzanne Koenig, as Patient Care Ombudsman
SAK Management Services, LLC
300 Saunders Rd.
Suite 300
Riverwoods, IL 60015

Attn: Suzanne Koenig

INVOICE

Re: CAH Acquisition Company #1, LLC d/b/a Washington County Hospital

Legal Services through October 31, 2019:

PREPARATION/REVIEW REPORTS:	\$	520.00
Total Fees:	\$	520.00
Current Invoice:	\$	<u>520.00</u>

NAP:ML
Tax ID: 13-3613083

Invoice No.: 5222251
Matter No.: 102171.013900

Page 1

Description of Professional Services Rendered:

TASK CODE: 824 PREPARATION/REVIEW REPORTS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/16/19	Nancy A. Peterman	Revise PCO report.	0.80	\$ 520.00
Total Hours:				0.80
Total Amount:				\$ 520.00

TIMEKEEPER SUMMARY FOR TASK CODE 824,

PREPARATION/REVIEW REPORTS

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Nancy A. Peterman	0.80	650.00	\$ 520.00
Totals:	0.80	650.00	\$ 520.00

Invoice No.: 5222251
Matter No.: 102171.013900

Page 2

Description of Professional Services Rendered

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Nancy A. Peterman	0.80	650.00	520.00
Totals:	0.80	650.00	\$ 520.00



Invoice No. : 5283180
File No. : 102171.013900
Bill Date : January 27, 2020

Suzanne Koenig, as Patient Care Ombudsman
SAK Management Services, LLC
300 Saunders Rd.
Suite 300
Riverwoods, IL 60015

Attn: Suzanne Koenig

INVOICE

Re: CAH Acquisition Company #1, LLC d/b/a Washington County Hospital

Legal Services through December 31, 2019:

CASE ADMINISTRATION:	\$	390.00
CLAIMS ADMINISTRATION & OBJECTIONS:	\$	1,147.50
PREPARATION/REVIEW REPORTS:	\$	433.50
Total Fees:	\$	1,971.00
Current Invoice:	\$	<u>1,971.00</u>

NAP:ML
Tax ID: 13-3613083

Invoice No.: 5283180
Matter No.: 102171.013900

Page 1

Description of Professional Services Rendered:

TASK CODE: 804 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/17/19	Nancy A. Peterman	Review order to show cause as to why case should not be converted (.10); telephone conference with Bankruptcy Administrator re same (.20); update S. Koenig re same (.30).	0.60	390.00
			Total Hours:	0.60
			Total Amount:	\$ 390.00

TIMEKEEPER SUMMARY FOR TASK CODE 804,

CASE ADMINISTRATION

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Nancy A. Peterman	0.60	650.00	390.00
Totals:	0.60	650.00	\$ 390.00

Invoice No.: 5283180
Matter No.: 102171.013900

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Description of Professional Services Rendered

TASK CODE: 805 CLAIMS ADMINISTRATION & OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/17/19	Tess D. Meyer	Call with N. Peterman re unreleased claims (.3); emailing with CMS and OGC re same (.9).	1.20	660.00
12/17/19	Nancy E. Taylor	Telephone conference with N. Peterman re unreleased claims (.2) and review materials (.3).	0.50	487.50
			Total Hours:	1.70
			Total Amount:	\$ 1,147.50

TIMEKEEPER SUMMARY FOR TASK CODE 805,

CLAIMS ADMINISTRATION & OBJECTIONS

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Nancy E. Taylor	0.50	975.00	487.50
Tess D. Meyer	1.20	550.00	660.00
Totals:	1.70	675.00	\$ 1,147.50

Invoice No.: 5283180
Matter No.: 102171.013900

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Description of Professional Services Rendered

TASK CODE: 824 PREPARATION/REVIEW REPORTS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/02/19	Danny Duerdoh	Draft notice of Ombudsman's 4th Report	0.10	43.50
12/15/19	Nancy A. Peterman	Revise report.	0.60	390.00
			Total Hours:	0.70
			Total Amount:	\$ 433.50

TIMEKEEPER SUMMARY FOR TASK CODE 824,

PREPARATION/REVIEW REPORTS

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Nancy A. Peterman	0.60	650.00	390.00
Danny Duerdoh	0.10	435.00	43.50
Totals:	0.70	619.29	\$ 433.50

Invoice No.: 5283180
Matter No.: 102171.013900

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Description of Professional Services Rendered

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Nancy A. Peterman	1.20	650.00	780.00
Nancy E. Taylor	0.50	975.00	487.50
Danny Duerdorff	0.10	435.00	43.50
Tess D. Meyer	1.20	550.00	660.00
Totals:	3.00	657.00	\$ 1,971.00

Invoice No.: 5283180
Re: CAH Acquisition Company #1, LLC d/b/a Washington County Hospital
Matter No.: 102171.013900

Page 5

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file

EXHIBIT B

BIOGRAPHICAL INFORMATION

Nancy A. Peterman is Chair of the Chicago Restructuring & Bankruptcy Practice. With over 25 years of experience, Nancy focuses her practice on complex corporate restructurings and M&A transactions involving special situations and distressed companies, whether implemented in court or out of court. She has represented private equity funds, debtors, sellers, purchasers, investor groups, and creditors in these matters. Nancy has experience in numerous industries, including manufacturing, real estate, retail, and gaming, with a focus on health care. Nancy assisted in drafting the health care bankruptcy provisions of Public Law No. 109-8 (the 2005 amendments to the Bankruptcy Code). Nancy received her B.A. from the University of Michigan in 1988 and her J.D. from the University of Michigan Law School in 1991.

Nancy E. Taylor is Co-Chair of the Health Care & FDA Practice and focuses her practice on health and FDA related matters. She has broad experience working with providers, plans, employers, private equity firms, and FDA regulated companies. She advises clients on health care transactions, health and FDA regulatory policy and compliance, and responding to Congressional and Administration investigations and audits. Prior to joining Greenberg Traurig, Nancy served 10 years as Health Policy Director for a Senate Committee and worked on a number of significant health and FDA laws. She also served as CEO of a start-up medical device company, where she obtained eight product clearances, including securing reimbursement coverage for each product.

Danny Duerdoh is an associate in the Restructuring & Bankruptcy Practice in the Chicago office. He has been employed with Greenberg Traurig since September 2019.

Tess D. Meyer advises payers, providers, biotech and pharmaceutical companies, large employers, and other health care stakeholders on health care regulatory compliance issues and policy objectives. She conducts complex regulatory and compliance assessments, including matters related to Affordable Care Act compliance, Medicaid and Medicare issues, and market conduct requirements.

Carla J. Greenberg is a paralegal in the Restructuring & Bankruptcy Practice in the Chicago office. She has been employed with Greenberg Traurig since 2001.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
GREENVILLE DIVISION

In re:)
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CAH ACQUISITION COMPANY #1, LLC,) Case No. 19-00730-5-JNC
d/b/a WASHINGTON COUNTY HOSPITAL)
) Chapter 11
Debtor.)
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**NOTICE OF SECOND INTERIM FEE APPLICATION OF GREENBERG TRAURIG,
LLP FOR ALLOWANCE OF INTERIM COMPENSATION AND REIMBURSEMENT
OF EXPENSES AS COUNSEL FOR THE PATIENT CARE OMBUDSMAN FOR THE
TIME PERIOD OF AUGUST 1, 2019 THROUGH JANUARY 31, 2020**

NOTICE IS HEREBY GIVEN that Greenberg Traurig, LLP (“**Greenberg Traurig**”) has filed their *Second Interim Fee Application of Greenberg Traurig, LLP for Allowance of Interim Compensation and Reimbursement of Expenses as Counsel for the Patient Care Ombudsman for the Time Period of August 1, 2019 Through January 31, 2020* (the “**Application**”);

FURTHER NOTICE IS HEREBY GIVEN that Greenberg Traurig, counsel to the Patient Care Ombudsman (the “**Ombudsman**”) has applied for compensation in the amount of \$3,736.00 for fees and \$0 for reimbursement of expenses, for a total of \$3,736.00 for the period of August 1, 2019 through January 31, 2020;

FURTHER NOTICE IS HEREBY GIVEN that the Application filed by the Ombudsman’s counsel may be allowed, provided that no objection and no request for a hearing is made by any party-in-interest in writing to the Clerk of this Court within twenty-one (21) days from the date of this notice; and

FURTHER NOTICE IS HEREBY GIVEN that if an objection and a request for a hearing is filed in writing by any party-in-interest within the allotted time, a hearing will be held on this Application based upon a time, date and place to be set by the Court and all parties-in-

interest will be notified accordingly. If no request for a hearing is timely filed, this Court may rule on the Application *ex parte* without further notice.

Respectfully submitted this 26th day of February, 2020.

By: /s/ Brian R. Anderson
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and

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(312) 456-8400

*Counsel to the Suzanne Koenig, the
Patient Care Ombudsman*

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
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CAH ACQUISITION COMPANY #1, LLC,) Case No. 19-00730-5-JNC
d/b/a WASHINGTON COUNTY HOSPITAL)
) Chapter 11
Debtor.)
)

CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2020, a true and correct copy of the **SECOND INTERIM FEE APPLICATION OF GREENBERG TRAURIG, LLP FOR ALLOWANCE OF INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES AS COUNSEL FOR THE PATIENT CARE OMBUDSMAN FOR THE TIME PERIOD OF AUGUST 1, 2019 THROUGH JANUARY 31, 2020** was sent via this Court's ECF notification system to the Bankruptcy Administrator, counsel who have filed a Notice of Appearance, and any party directly affected by the pleading via ECF notification:

Marjorie K. Lynch (via ECF) Brian Behr (via ECF) Kirstin E. Gardner (via ECF) 434 Fayetteville St. Suite 640 Raleigh, NC 27601 <i>Bankruptcy Administrator</i>	Terri L. Gardner (via ECF) Nelson Mullins Riley & Scarborough, LLP 4140 Parklake Avenue, Suite 200 Raleigh, NC 27612 <i>Counsel for Petitioning Creditors</i>
Katherine M. McCraw (via ECF) Assistant Attorney General N.C. Department of Justice Post Office Box 629 Raleigh, NC 27602-0629 <i>Counsel for NC DHHS/DHB</i>	Thomas W. Waldrep, Jr. (via ECF) Waldrep LLP 101 S Stratford Road, Suite 210 Winston-Salem, NC 27104 <i>Trustee</i>
Ryan J. Adams (via ECF) Adams, Howell, Sizemore & Lenfestey, PA 1600 Glenwood Ave., Suite 101 Raleigh, NC 27608	Felton E. Parrish (via ECF) Hull & Chandler, P.A. 1001 Morehead Square Drive, Suite 450 Charlotte, NC 28203

Nicholas Zluticky (via ECF) Stinson Leonard Street LLP 1201 Walnut Street, Suite 2900 Ste 2700 Kansas City, MI 64106-2150	Rayford K. Adams, III (via ECF) Spilman Thomas & Battle, PLLC 110 Oakwood Dr., Suite 500 Winston-Salem, NC 27103
E. Franklin Childress (via ECF) 165 Madison Avenue, Suite 2000 Memphis, TN 38103	M. Ruthie Hagan (via ECF) Baker, Donelson, Bearman, Caldwell 165 Madison Avenue, Suite 2000 Memphis, TN 38103
David J Haidt (via ECF) Ayers & Haidt, P.A. PO Box 1544 307 Metcalf Street New Bern, NC 28563	Tyler E. Heffron (via ECF) Triplett Woolf Garretson, LLC 2959 N. Rock Road, Suite 300 Wichita, KS 67226
Brian H. Smith (via ECF) Complete Business Solutions Group, Inc. 20 N. 3rd Street Philadelphia, PA 19106	W. Tyler Chastain (via ECF) Bernstein, Stair & McAdams, LLP 116 Agnes Road Knoxville, TN 37919
Eric L. Johnson (via ECF) Matthew A. Petersen (via ECF) Spencer Fane LLP 1000 Walnut Street, Suite 1400 Kansas City, MO 64106	Stephen W. Petersen (via ECF) Jeffrey R. Whitley (via ECF) Fox Rothschild, LLP Post Office Box 27525 Raleigh, NC 27611
Patricia E. Hamilton (via ECF) Stevens & Brand, LLP 917 S.W. Topeka Boulevard Topeka, KS 66612	Wesley F. Smith (via ECF) Stevens & Brand, LLP 900 Massachusetts Street, Suite 500 Lawrence, KS 66044
Sharon L. Stolte (via ECF) Sandberg Phoenix & von Gontard P.C. 4600 Madison Avenue, Suite 1000 Kansas City, MO 64112	Katherine Montgomery McCraw (via ECF) North Carolina Department of Justice PO Box 629 Courier Number 51-41-22 Raleigh, NC 27602-0629
John Paul H. Cournoyer (via ECF) Northen Blue, LLP PO Box 2208 Chapel Hill, NC 27515-2208	Christopher A. McElgunn (via ECF) Klenda Austerman LLC 1600 Epic Center 301 N Main Wichita, KS 67202-4816

<p>John M. Sperati (via ECF) SmithDebnamNarronDrakeSaintsing&Myers 4601 Six Forks Road, Suite 400 Raleigh, NC 27609</p>	<p>Jerry P. Spore (via ECF) Spragins, Barnett & Cobb, PLC 312 E. Lafayette Street Jackson, TN 38301</p>
<p>Jonathan O. Steen (via ECF) Spragins, Barnett & Cobb, PLC 213 E. Lafayette Street Jackson, TN 38301</p>	<p>Jason L. Hendren (via ECF) Rebecca F. Redline (via ECF) Hendren Redwine & Malone, PLLC 4600 Marriott Drive, Suite 150 Raleigh, NC 27612</p>
<p>James C. Lanik (via ECF) Jennifer B. Lyday (via ECF) Francisco T. Morales (via ECF) Waldrep LLP 101 S. Stratford Road, Suite 210 Winston-Salem, NC 27104</p>	

/s/ Brian R. Anderson

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Counsel to the Suzanne Koenig, the Patient Care Ombudsman